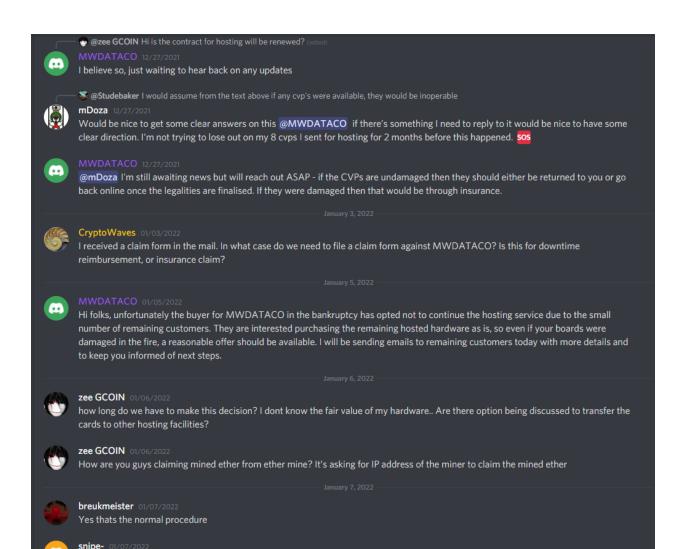
# UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

In re:	)	Case No. 21-61491
SQUIRRELS RESEARCH LABS, LLC, et al.	)	Chapter 11
Debtors.	) ) )	Jointly Administered Judge Russ Kendig
	)	

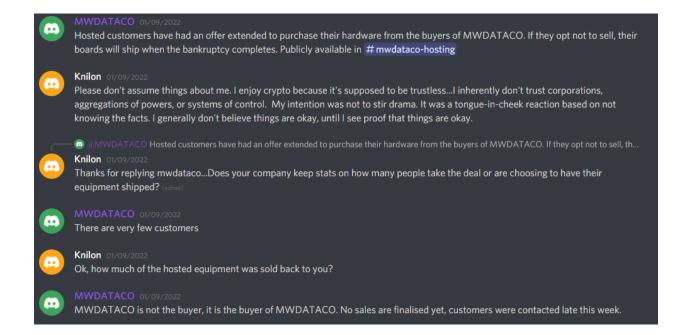
## TOREA CONSULTING, LTD'S OBJECTION TO MODIFICATION OF SALE

Movant Torea Consulting, Ltd. ("Torea"), by and through its undersigned counsel, hereby files this limited objection to the Modification of the Asset Purchase Agreement (docket No. 124) for the purpose of protecting the information requested by Torea in its 2004 Examination Request (docket No. 122).

- 1. Torea incorporates paragraphs 1 through 12 of its 2004 Request as fully rewritten herein.
  - 2. The following came to the attention of counsel for Torea this morning:



@breukmeister not that easy with mwdataco as public IP might not be known (edited)



3. These communications indicate that the prospective Buyer is negotiating agreements directly customers and owners of specific equipment outside the scope of this process. The confusion that could result and spoilation of evidence is a risk that must be addressed prior to the closing of this piecemeal liquidation reflected in the modification.

Date: January 11, 2022

/s/ David M. Neumann
David M. Neumann (Ohio No. 0068747)
dneumann@meyersroman.com
R. Scott Heasley (Ohio No. 0087235)
sheasley@meyersroman.com
Meyers, Roman, Friedberg & Lewis
28601 Chagrin Blvd., Suite 500
Cleveland, Ohio 44122
Telephone: 216-831-0042

Fax: 216-831-0542

Counsel for Torea Consulting Ltd.

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served this 11<sup>th</sup> day of January 2022 via the Court's electronic mail notice list upon the following:

- **John C. Cannizzaro** John.Cannizzaro@icemiller.com, lauren.prohaska@icemiller.com
- Christopher Paul Combest christopher.combest@quarles.com
- John G. Farnan jfarnan@westonhurd.com
- Robert E. Goff rgoff@westonhurd.com, jroberts@westonhurd.com
- **Jeannie Kim** JeKim@sheppardmullin.com, dgatmen@sheppardmullin.com
- Marc Merklin mmerklin@brouse.com, tpalcic@brouse.com;mmiller@brouse.com
- Christopher Niekamp cniekamp@bdblaw.com
- Paul J. Schumacher pschumacher@dmclaw.com, tgross@dmclaw.com
- Frederic P. Schwieg fschwieg@schwieglaw.com
- Frederic P. Schwieg fschwieg@schwieglaw.com
- United States Trustee (Registered address)@usdoj.gov
- **Joshua Ryan Vaughan** jvaughan@amer-collect.com, SAllman@AMER-COLLECT.COM;HouliECF@aol.com
- Julie K. Zurn jzurn@brouse.com, tpalcic@brouse.com
- Kate M. Bradley ust44 kate.m.bradley@usdoj.gov

Via regular U.S. Mail:

#### **Brouse McDowell**

388 South Main Street Suite 500 Akron, OH 44311-4407

#### Jason R. Schendel

Sheppard, Mullin, Richter & Hampton LLP Four Embardadero Center Seventeenth Floor San Francisco, CA 94111

> /s/ David M. Neumann Counsel for Movant Torea Consulting Ltd.